

EXHIBIT B

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 People of the State of California, et al.

MDL No. 3047

12 v.

Case Nos. 4:23-cv-05448-YGR

13 Meta Platforms, Inc.; Instagram, LLC; Meta
14 Payments, Inc.; Meta Platforms Technologies,
15 LLC,

**DECLARATION OF THOMAS
WILLIAMS REGARDING UNDUE
BURDENS FOR THE STATE OF
HAWAI'I DEPARTMENT OF BUDGET
& FINANCE EMPLOYEES'
RETIREMENT SYSTEM**

16 IN RE: SOCIAL MEDIA ADOLESCENT
17 ADDICTION/PERSONAL INJURY
18 PRODUCTS LIABILITY LITIGATION THIS
19 DOCUMENT RELATES TO:

Judge: Hon. Yvonne Gonzalez Rogers

4:23-cv-05448

Magistrate Judge: Hon. Peter H. Kang

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21 I, Thomas Williams, hereby declare and state as follows:
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23 1. I am the Executive Director for the Employees' Retirement System ("ERS") of the
24 State of Hawai'i, which is an administratively attached agency of the State of Hawai'i's
25 Department of Budget and Finance.

26 2. I make the following statements based upon my personal knowledge.

27 3. Defendant Meta Platforms, Inc.'s ("Meta") deposition topics, particularly topic
28 number 13 in Meta's amended Rule 30(b)(6) deposition notice, dated January 21, 2025, impose an

1 undue burden on ERS due to the scope of the request.

2 4. ERS serves as a retirement trust for the State of Hawaii's public sector employees
3 and is authorized to make investments to fund the State and Counties' retiree benefits.

4 5. ERS does not at present directly make its investments but rather contracts with
5 over 400 independent managers to manage its funds.

6 6. As such, ERS does not maintain records of all market activity and will need to
7 reach out to each of its 400-plus managers to gather information responsive to Meta's request.

8 7. Furthermore, our reporting system does not categorize stocks using the term
9 "social media."

10 8. Instead, the nearest category is "media and communications," which is likely to
11 pull in copious amounts of extraneous information.

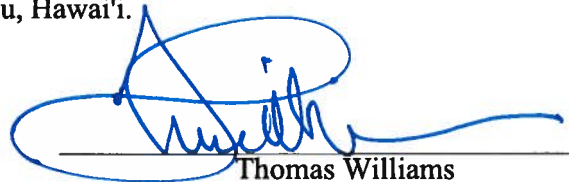
12 9. Meta's request for the State's investments over a 12-year period will require
13 extensive outreach and processing, not just by ERS but by its independent managers and/or
14 custodial bank.

15 10. Based on the above, attempting to designate a deponent to testify on behalf of all
16 investments in social media platforms concerning the State will be extremely challenging and
17 burdensome for ERS.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed on March 17, 2025, in Honolulu, Hawai'i.

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Thomas Williams